
5.9 HISTORICAL, ARCHITECTURAL, ARCHAEOLOGICAL, AND CULTURAL RESOURCES

In accordance with FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*, this EIS includes an investigation of impacts due to Federal undertakings upon areas of historic, architectural, archaeological, and cultural significance. The purpose of this section is to document compliance with the National Historic Preservation Act of 1966 (NHPA) by identifying historic properties within the area of potential effect (APE) including a description of the probable impact of the alternatives under consideration on these resources.

5.9.1 Background Information

This subsection outlines the applicable Federal regulations, thresholds of significance, and a summary of the methodologies used to identify historic properties.

5.9.1.1 Regulatory Context

Applicable laws relevant to the analysis of historical, architectural, archaeological and cultural resources include the National Historic Preservation Act (NHPA) of 1966, as amended in 1992, and its implementing regulations, most recently amended in 2004. The NHPA requires that the lead agency, FAA, consult with the State Historic Preservation Officer (SHPO). In Illinois, the SHPO is part of the Illinois Historic Preservation Agency (IHPA). The NHPA also requires that the FAA gather information to determine which properties in a project's area of potential effect are listed in or eligible for the National Register of Historic Places (NRHP). The NRHP is maintained by the Secretary of the Interior. The Keeper of the NRHP is individual who has been delegated the authority by the National Park Service to list properties and determine their eligibility for the NRHP.

The NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources. Resources listed in the NRHP include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture and possess integrity of location, design, setting, materials, workmanship, feeling and association.¹

Resources listed in the NRHP are defined as historic properties. Historic property

...means any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion in, the National Register of Historic Places.

The term eligible for inclusion in the National Register includes both properties formally determined as such in accordance with the regulations of the Secretary of the Interior and all other properties that meet the National Register criteria.²

¹ Integrity is the ability of the resource to convey its significance. In order to be eligible to the NRHP resources must have both significance and integrity.

² 36 CFR Part 800 – Protection of Historic Properties (incorporating amendments effective August 5, 2004).

In accordance with Sections 800.2 and 800.3 of its revised regulations (36 CFR Part 800, "Protection of Historic Properties, effective June 17, 1999) implementing Section 106 of the NHPA, the requirements of the Section 106 consultation process is as follows:

- Determine if a project is an undertaking as defined by the NRHP, and if so, initiate the review with the SHPO,
- The responsible Federal Agency (FAA) identifies the area of potential effect (APE). The APE is defined as the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if historic properties are subsequently identified within the APE,
- Identify which properties within the APE are historic properties,
- Determine the effect of an undertaking on the historic properties,
- Assess adverse effects, and
- Resolve adverse effects through a Memorandum of Agreement with the SHPO/THPO; or in cases where there is a failure to agree, allow the Advisory Council on Historic Preservation (ACHP) an opportunity to comment.³

Historic properties are also covered under Section 4(f) of the U.S. Department of Transportation Act of 1966, recodified as 49 U.S.C. Section 303(c). **Section 5.8, Department of Transportation Section 4(f) Lands and Land and Water Conservation Fund Section 6(f) Lands**, describes the resources covered under Section 4(f), such as historic properties, public parks, forest preserves and locally important historic sites, and documents the impact of the alternatives relative to the Section 4(f) and Section 6(f) requirements.

5.9.1.2 Thresholds of Significance

A threshold of significance is a quantitative or qualitative standard, or set of criteria, pursuant to which the significance of a given environmental effect may be determined. Specifically, the threshold of significance as stated in FAA Order 1050.1E (Appendix A, 11.3):

Regulations at 36 CFR 800.8(a) state that an adverse effect finding does not automatically trigger preparation of an EIS (i.e., a significant impact). The section 106 consultation process includes consideration of alternatives to avoid adverse effects on National Register listed or eligible properties; of mitigation measures; and of accepting adverse effects. But in all cases, the FAA makes the final determination on the level of effect and whether the appropriate action choice is an EIS or FONSI. Advice from the ACHP and SHPO/THPO may assist the FAA in making this determination.

Furthermore, as stated in FAA 1050.1E (Appendix A, 11.2m), in making a finding of adverse effect, the FAA considers the following:

³ The ACHP provides a web site that outlines the Section 106 process in detail, including a flow chart, description and a link to the regulations. For in depth description of the process see Website: <http://www.achp.gov.106summary.html>.

If a NRHP-eligible property occurs within the undertaking's APE and the project may alter the property's historic characteristics.... The FAA Official will make a "finding of adverse effect" when the undertaking would: (1) physically destroy the property; (2) alter the property so severely that it would not meet the requirements of the Secretary of the Interior's "Standards for Treatment of Historic Properties" (36 CFR Part 68); (3) remove the property from its historic location; (4) introduce an atmospheric, audible, or visual feature to the area that would diminish the integrity of the property's setting, provided that setting contributes to the property's historical significance; or (5) through transfer, sale, or lease, diminishes any long-term preservation of a property's historic significance that Federal ownership or control would preserve.

Suggested guidelines for evaluating land use compatibility with noise exposure were developed by the Federal government and adopted by FAA (based on 14 CFR Part 150). The FAA's noise compatibility guidelines generally identify three thresholds of noise levels (65, 70, and 75 DNL, with some provisions for higher levels if structures, such as an incompatible use: auditoriums or museums can be soundproofed) depending on the types of activities that occur at the site. These guidelines were used to determine acceptable noise levels over the historic resources identified in this document.

5.9.1.3 Methodologies

Impacts

For purposes of this section of the EIS, a direct impact would result if a historic resource would be acquired and removed or relocated. Potential indirect impacts could occur if noise levels at a historic resource would be in excess of 65 DNL such as to diminish the integrity of the setting if it would contribute to the historical significance. Where direct impacts occur, the resource would be removed or relocated, and therefore, would not be indirectly impacted as a result of noise levels.

Identification of the Area of Potential Effect

FAA Order 1050.1E, Appendix A, Section 11.2c notes that it is the FAA's responsibility to determine the project's area of potential effect (APE). Based on the proposed Build Alternatives, the APE was defined in four components and is comprised of the areas on **Exhibit 5.9-1**:

- **On-Airport Direct Impact Area**– These are areas on existing Airport property where historic properties could be impacted.
- **On-Airport Indirect Impact Area**– These are areas on the existing Airport where historic properties could remain undisturbed.
- **Off-Airport Direct Impact Area**– These are areas where land acquisition is proposed. For the purposes of this analysis, the acquisition areas are those areas to be acquired to enable construction of Build Alternatives. These consist of the Northwest Parcel, the Southwest Parcel, and the cemetery properties as depicted in **Exhibit 5.9-1**. The Southwest Parcel is slightly different under Alternatives D and G, with less land being required. Within the Off-Airport Direct Impact Areas for each of

the Build Alternatives, all buildings in the related acquisition areas are assumed to be demolished upon acquisition.

- **Off-Airport Indirect Area**– These are areas off existing Airport property and outside of the acquisition areas, but within the overall areas potentially bound by the 65 DNL noise contour areas for each of the alternatives under consideration for each phase of analysis.

Consultation

The NHPA requires that the Lead Federal agency, FAA, consult with the SHPO. As such, consultation was initiated on November 7, 2002 with the SHPO to inform them of the scope of the undertaking and to provide ongoing opportunities for informal and formal review of the project's potential effect on historic resources. A follow-up meeting was conducted with the SHPO and the FAA's TPC on December 19, 2004. These reviews included discussion of the proposed acquisition areas, on-airport properties (including on-Airport buildings and archaeology), two cemeteries, and two predictive archaeological models where properties are not accessible.

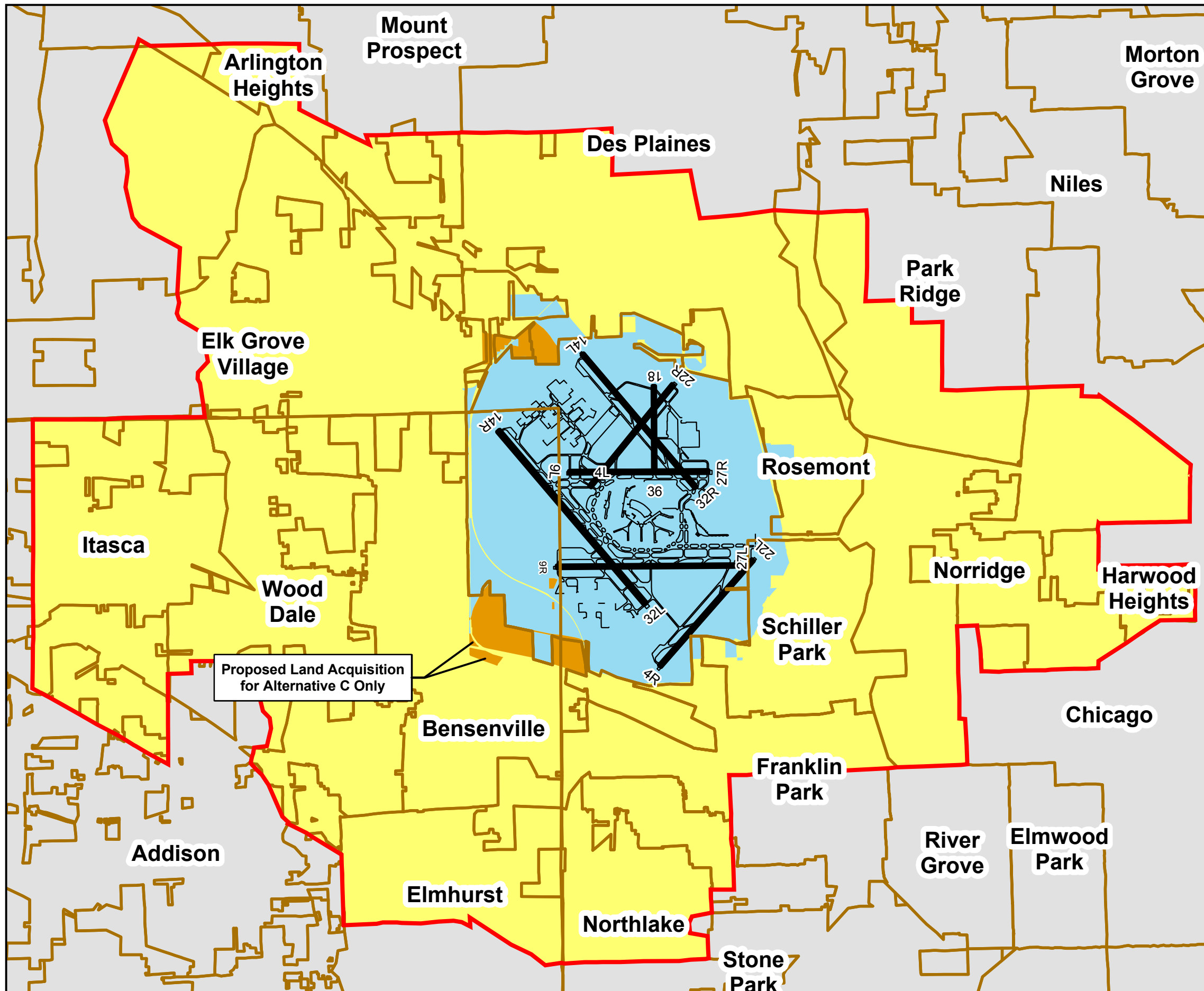
Local municipalities in the APE were also provided an opportunity to provide information concerning formally identified local landmarks.⁴ Each community within the general boundary was identified and contacted to request information on all locally identified cultural, historic and architectural resources pertinent to this EIS.⁵ Specifically within each community, the local historical commission, historical society, or if no such organization was identified, the village, municipality or local library was contacted. The contact was initiated via fax and follow-up was provided via telephone or email.⁶ Each initial fax stipulated, if the organization was not the appropriate contact, that an appropriate contact be provided. All locally identified sites were compiled for purposes of the Section 4(f) evaluation and are included in the analysis presented in **Section 5.8** and **Appendix L**. All local sites within the direct acquisition areas were evaluated as part of the Section 106 process.

Finally, a tribal consultation process was initiated early in the process. A list of the Native American tribal groups that were contacted, the correspondence sent, and responses are included in **Appendix M, Historic, Architectural, Archaeological, and Cultural Resources**. Historically, the greater Chicago area has been associated with a wide range of tribal activities from many Native American groups.

⁴ Municipalities of Addison, Arlington Heights, Bensenville, Chicago (portions), Des Plaines, Elk Grove Village, Elmhurst, Franklin Park, Harwood Heights, Itasca, Mount Prospect, Norridge, Northlake, Park Ridge, River Grove, Rolling Meadows, Rosemont, Schaumburg, Schiller Park, Wood Dale as well as portions of unincorporated DuPage and Cook Counties were consulted.

⁵ Correspondence Log, Archaeological Research Incorporated [TPC].

⁶ OM EIS IHPA Comment Letters (CD), Archaeological Research Incorporated [TPC], December 15, 2004.



Source: Crawford, Murphy and Tilly, Inc. 2004



Chicago

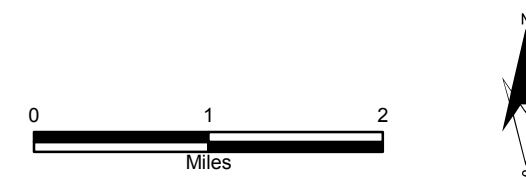
O'Hare

International

Airport

O'Hare Modernization Environmental Impact Statement

- Project Area
- Community Boundaries
- Off-Airport Indirect Impact Area
- Off-Airport Direct Impact Areas
- On-Airport Direct & Indirect Impact Area



Areas of Potential
Impact

► Exhibit 5.9-1

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Identification of Historic Resources

As previously mentioned, the NHPA requires that the FAA gather information to determine which properties in a project's APE are listed on or eligible for the NRHP. This process consists of two phases: 1) identification also referred to as Phase I Investigations, and 2) DOE or Phase II Investigations. This section outlines the methodology utilized in the process of identifying historic properties. The full methodological statements are included with the technical documents in **Appendix M**.

Set forth below is a brief outline of the phases that comprise a historic and an archaeological evaluation.

Phase I

The Phase I Investigation is the cultural resource identification procedure in a Section 106 Evaluation. This phase requires an investigation of the APE for historic standing structures and historic or prehistoric archaeological sites. There are three components to the Phase I Investigation: Background Document Search, Field Survey and Final Report Preparation.

- **Background Document Search:** The Background Documents Search included an examination of the state archaeological files and the state historic standing structures files. Additionally, old atlases and plat books for the APE are examined for any information on historic standing structures or potential for prehistoric or historic archaeological sites. The Background Document Search data allows for a baseline historic context statement to be developed.
- **Field Survey:** The field survey requirements are different for historic standing structures and archaeological sites. All standing structures within the APE are photographed and evaluated. Modern standing structures (less than 50 years old), and historic standing structures and buildings or features (50 years old or older) are photographed. The APE is also surveyed for prehistoric and historic archaeological resources. This survey consists of reconnaissance and shovel test survey. A reconnaissance survey is conducted by a simple walk over of the APE. If visibility is low, shovel testing will be conducted to locate any buried archaeological sites. Geomorphological testing to locate buried deposits on flood plains of all major rivers and also on smaller rivers is also required during the Phase I Investigations.
- **Final Report:** After all the documentary research and field survey is completed a Final Report is completed for submission to the Illinois Historic Preservation Agency (IHPA). The Final Report may be prepared together for standing structures and archaeological resources.

Historic standing structures, buildings or features are evaluated for potential significance under the National Register of Historic Places Criteria. This consists of evaluating the historic structures, buildings or features within the baseline historic context data gathered during the Background Documents Search. Based upon the historic context and photograph evaluation, historic standing structures, buildings or features are either recommended to be not eligible or

recommended to need additional documentation. If a historic standing structure, building or feature is determined to need additional documentation, the historic structure needs Phase II Investigations (Determination of Eligibility).

Archaeological sites will be evaluated in a regional context and also recommended for no further testing or Phase II Investigations.

Phase II Investigations

Phase II Investigations are required when a historic standing structure, building or feature and archaeological sites are encountered within the APE and if the State Historic Preservation Officer (SHPO) concurs or determines that Phase II Investigations are necessary. Phase II Investigations are Determinations of Eligibility to the National Register of Historic Places (DOE).

A DOE is an evaluation of the historic standing structure or an archaeological site formally applying the National Register Criteria for Evaluation. A historic standing structure is evaluated for significance or integrity (exterior and interior). This includes a rigorous development of the historic context statement and additional photographs may be necessary to document integrity.

On-Airport Direct and Indirect Impact Areas

The on-Airport direct impact areas for the Build Alternatives consist of those areas where buildings, structures or objects would be demolished or relocated. The on-Airport indirect impact areas consist of all other airport property. There are existing buildings, structures or objects within the indirect impact on-Airport areas that would not be relocated or demolished and therefore, no direct impacts would be realized. Further, the noise or visual impact on these buildings, structures or objects are not anticipated to change significantly on Airport property. Therefore, only the direct impacts (those to be removed or relocated) to potential historic properties on Airport property were evaluated and assessed.

Two primary sources were reviewed to establish the baseline for identification. These included the World Gateway Program (WGP) Environmental Assessment.⁷ A report was also prepared by Midwest Archaeological Research Services, Inc. [CCT] titled *Report of Investigations for the Chicago O'Hare International Airport O'Hare Modernization Program Investigations within the DNL 65 Noise Impact Area Surrounding O'Hare International Airport* (Investigations Report).⁸ The WGP EA did not review the NRHP listings, but did provide baseline descriptions of various historic resources on airport. The Investigations Report did identify NRHP listings and carried over resources identified in the WGP. Both reports mentioned the military base and previous IHPA sign off letters that are generally valid from one to two years after date of issue. In subsequent discussions, the IHPA requested that the military base be resubmitted for review as a part of this EIS. Neither report identified the entire existing Airport as a district for listing on the NRHP.

⁷ World Gateway Program Environmental Assessment, Federal Aviation Administration, June 2002.

⁸ Draft Report of Investigations, Chicago O'Hare International Airport, O'Hare Modernization Program, MARS, Inc. [CCT] Archaeological Survey Work, December 13, 2002.

A site visit of buildings, structures or objects in the on-Airport direct impact areas, including the military base was conducted and photo documentation was undertaken for each of these resources as well as of resources identified in the WGP. A report entitled *Architectural Investigation and Determinations of Eligibility for On-Airport Properties* was completed and submitted to the IHPA on May 20, 2005.⁹ The IHPA responded to the FAA on June 23, 2005 and requested that three structures (the Rotunda, H & R Plant, and O'Hare Hilton) "be evaluated for National Register eligibility."¹⁰ The FAA discussed the letter with the IHPA on June 24th, 2005. The IHPA stated that as there are no proposed impacts to the three structures under any of the Build Alternatives, there would be no need for evaluations of National Register eligibility. During that June 24th discussion, the IHPA requested that the FAA send a letter to IHPA with that information, and FAA sent a letter to that effect on June 27, 2005.¹¹

Copies of the DOE transmittal letters and response letters from the IHPA are included in **Appendix M**.

Off-Airport Direct Impact Areas

The potential exists for any historic resource within the Off-Airport Direct Impact Areas to be demolished or moved to permit airport development for the various Build Alternatives. Specifically, the Off-Airport Direct Impact Areas include the Northwest (NW) Parcel, the Southwest (SW) Parcel, Rest Haven Cemetery and St. Johannes Cemetery. **Exhibit 5.9-1** shows the limits of the proposed land acquisition associated with each Build Alternative.

Northwest and Southwest Parcels

The analysis of the NW and SW off-Airport land areas was conducted in phases. First, a background literature search of all known historic properties, including archaeological resources, was conducted. Second, Phase I Standing Building, Structure and Object Investigations of the NW and SW Parcels were conducted from February 2003 through April 2003. Drafts of both those reports were submitted to the IHPA in April 2003 and July 2004. Copies of these reports and comment letters from IHPA are included in **Appendix M, Historic, Architectural, Archaeological, and Cultural Resources**.

Phase I Prehistoric and Historic Archaeological Predictive Models were developed for both the NW and SW Parcels in July 2004 and were reviewed by the IHPA. A Phase I prehistoric and historic archaeological assessment typically is twofold. The first portion consists of an evaluation of historic land use, prehistoric to present. The second portion develops a predictive ranking system of potential for archaeological resources, both prehistoric and historic, under areas not accessible during normal archaeological investigations (e.g. paved parking lots or underneath standing buildings, structures or objects). These Archaeological Predictive Models were completed since the full Phase I Prehistoric and Historic Archaeological Assessment was not able to be developed because direct access to the parcels was not granted and access would not be possible until any potential land acquisition occurs. Full methodological details and the

⁹ Architectural Investigation and Determinations of Eligibility for On-Airport Properties, May 20, 2005.

¹⁰ Letter from IHPA to FAA, June 23, 2005.

¹¹ Letter from FAA to IHPA, June 27, 2005.

Draft Archaeological Predictive Models and comment letters from IHPA are included in **Appendix M, Historic, Architectural, Archaeological, and Cultural Resources.**

Cemeteries

Rest Haven Cemetery and St. Johannes Cemetery, due to their sensitivity, were immediately focused on the higher level of investigation, a DOE. The two cemeteries were verbally recommended by the FAA to IHPA to be potentially eligible to the NRHP. IHPA requested that a formal written document for each be prepared.

The DOE for the St. Johannes Cemetery was submitted to the IHPA for review on March 31, 2005. The FAA recommended this Cemetery eligible for listing in the NRHP. However, the IHPA did not concur with this recommendation on April 29, 2005.¹² As required under the Section 106 implementing regulations, "If the agency official [FAA] and the SHPO do not agree, or if the Council or the Secretary so request, the agency official [FAA] shall obtain a determination of eligibility from the Secretary pursuant to 36 CFR Part 63."¹³ The FAA forwarded the DOE and the IHPA letter to the Keeper on May 6, 2005 with a request that the Keeper review the materials to determine the cemetery's eligibility for the NRHP. The Keeper provided a determination that the cemetery is eligible for the NRHP on June 9, 2005.¹⁴ On June 14, 2005, the IHPA submitted a letter to the Keeper of the NRHP stating that they would be filing a request for reconsideration of the eligibility determination in ten days.¹⁵ IHPA submitted materials in support of the request for reconsideration to the Keeper of the NRHP on June 24, 2005.¹⁶ FAA reviewed the materials submitted by IHPA to the Keeper of the NRHP and submitted materials in support of FAA's original recommendation of eligibility on July 7, 2005.¹⁷ A response on the final determination of eligibility is due from the Keeper of the NRHP in July 2005. However, irrespective of the final determination on eligibility, for purposes of this EIS, FAA is treating St. Johannes cemetery as a locally important historic property.

The Rest Haven Cemetery DOE was submitted to the IHPA for review on May 25, 2005. On June 24, 2005, IHPA requested bibliography materials in support of FAA's DOE.¹⁸ FAA submitted the bibliography materials to IHPA on June 27, 2005.¹⁹ A response on the IHPA's determination of eligibility is due in July 2005. However, irrespective of the determination on eligibility, for purposes of this EIS, FAA is treating Rest Haven Cemetery as a locally important historic property.

DOEs were also completed for the Green Street School,²⁰ the Gas Service Station,²¹ Schwerdtfeger Farmstead.²² IHPA concurred with the FAA's recommendations of eligibility for

¹² Letter from IHPA to FAA regarding St. Johannes Cemetery, April 29, 2005.

¹³ 36 CFR Part 800 – Protection of Historic Properties {incorporating amendments effective August 5, 2004}.

¹⁴ Letter from Keeper of the NRHP to the FAA, June 9, 2005.

¹⁵ Letter from IHPA to Keeper of the NRHP, June 14, 2005.

¹⁶ Letter from IHPA to Keeper of the NRHP, June 24, 2005.

¹⁷ Letter from FAA to Keeper of the NRHP, July 7, 2005.

¹⁸ Letter from IHPA to FAA, June 24, 2005.

¹⁹ Letter from FAA to IHPA, June 27, 2005.

²⁰ Green Street School Determination of Eligibility, April 25, 2005.

²¹ Gas Service Station Determination of Eligibility, April 22, 2005.

²² Schwerdtfeger Farmstead Determination of Eligibility, May 20, 2005

listing in the NRHP for Green Street School²³ and the Gas Service Station.²⁴ Final reviews by IHPA on the Schwerdtfeger Farmstead and the On-Airport Properties are still pending. IHPA submitted a letter to the FAA on June 22, 2005, with questions regarding information contained in the FAA's DOE for the Schwerdtfeger Farmstead.²⁵ FAA provided a response to the questions posed by IHPA on June 24, 2005.²⁶ A response on the IHPA's determination of eligibility is due in July 2005. However, irrespective of the determination on eligibility, for purposes of this EIS, FAA is treating the Schwerdtfeger Farmstead as a locally important historic property.

Copies of the DOE transmittal letters and response letters from the IHPA are included in **Appendix M**.

Off-Airport Indirect Impact Areas

Historic properties that are located outside of the acquisition areas, but within the potential noise impact areas (65 DNL or greater) would not be directly affected, that is they would not be demolished or destroyed. Auditory and vibrational impacts may indirectly affect standing structures. Other indirect impacts to standing structures may also result from traffic, either pedestrian or vehicular, outside the designated area of construction. Archaeological sites within the off-airport indirect impact areas, conversely, would not be impacted, thus an overall archaeological records search was not conducted in these areas.

A background literature and documents search²⁷ was conducted on historical, architectural and cultural properties for the entire APE, as depicted on **Exhibit 5.9-1**. It should be noted that for the properties termed "local sites," none are currently identified as being listed or eligible to the NRHP.²⁸ Therefore, for the purposes of the assessment of indirect impacts, the analysis of the study area was solely assessed based on known inventoried properties that are listed or eligible for the National or State Register of Historic Places as of August 2004, and that are listed by the Commission on Chicago Landmarks. The Commission on Chicago Landmarks is the only Certified Local Government (CLG) within the study area identified on the IHPA list, last updated in March 2004. The CLG program was established by the National Historic Preservation Amendments of 1980. The program allows municipal governments and counties the opportunity to participate in state and federal preservation activities. To become certified, they must have a local preservation ordinance, a preservation review commission, have a local survey program to identify historic resources and provide for public participation. The certified participants play a powerful role in historic preservation and the program supports their work

²³ IHPA review letter of Green Street School DOE, May 10, 2005.

²⁴ IHPA review letter of Gas Station School DOE, May 10, 2005.

²⁵ Letter from IHPA to FAA, June 22, 2005.

²⁶ Letter from FAA to IHPA, June 24, 2005.

²⁷ Sources include National Historic Landmarks, the NRHP listed or eligible, Acquisition Area DOE's, Illinois Department of Transportation Historic Bridge List, Commission on Chicago Landmarks, DuPage County Cultural and Historical Inventory, Local Municipal Landmark, IHPA DuPage County Landmark Survey IHPA Cook County Landmark Survey, IHPA Sprague Survey, IHPA Cultural Resource Management Survey, IHPA Review and Compliance DOE, IHPA NRHP Preliminary Positive Opinion and IL Archaeological Site File w/in direct APE.

²⁸ "Local sites" include all those identified on the DuPage County Cultural and Historical Inventory, Local Municipal Landmarks, IHPA DuPage County Landmark Survey, IHPA Cook County Landmark Survey, IHPA Sprague Survey, IHPA Cultural Resource Management Survey.

with technical assistance, awarding grants and coordinating networks of participating communities. Other than the Commission on Chicago Landmarks, no other community within the direct or indirect APE is listed as a CLG.

However, these local sites are included for analysis in **Section 5.8, Section 4(f) and 6(f) Resources** as well as the Section 4(f) and Section 6(f) Evaluation included in **Appendix L**. The potential environmental consequences related to the Build Alternatives were determined with the use of this available and existing data in conjunction with field photograph reconnaissance to verify the presence or absence of these known resources.

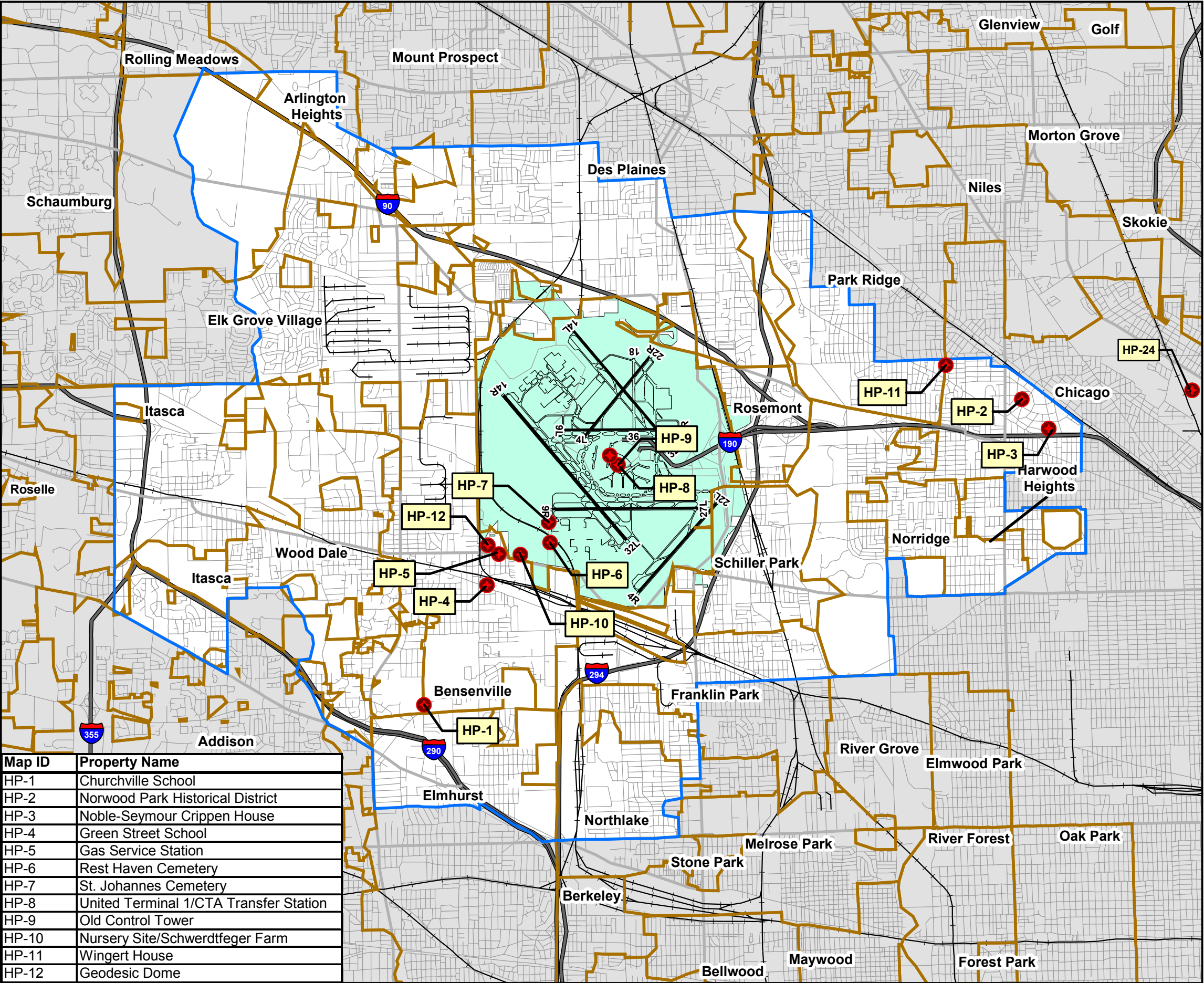
5.9.2 Baseline Conditions

A total of 13 properties of historic interest were identified within the APE. These sites were identified from a number of listing sources as identified on **Table 5.9-1. Exhibit 5.9-2** shows the location of these sites within the project's APE.

Since the completion of the Draft EIS, formal Determinations of Eligibility (DOEs) were completed for potential historic sites within the proposed land acquisition areas. These DOEs were forwarded to the IHPA for determination of eligibility to the NRHP. One resource, the Geodesic Dome, was previously noted as a potential NRHP resource. However, upon completion of the DOE for the Geodesic Dome,²⁹ the FAA has recommended that this site is not eligible for listing in the NRHP. IHPA reviewed and concurred with this finding.³⁰ As a result, this site is no longer included in this analysis.

²⁹ Geodesic Dome Determination of Eligibility, FAA, April 15, 2005.

³⁰ Geodesic Dome DOE Review Letter, IHPA, May 3, 2005.



Source: Municipal Boundaries; 2000 U.S. Census. Streets: StreetMap USA, ESRI 2003. See Table 5.9-1 For Historical Resources Information.



Chicago
O'Hare
International
Airport

**O'Hare Modernization
Environmental Impact Statement**

- Potential Historic Properties
- Freeways
- Secondary Roads
- Local Streets
- Railroads
- Project Area
- Community Boundaries
- Airport Property



**Properties of
Historic Interest**

► Exhibit 5.9-2

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TABLE 5.9-1
DESCRIPTION OF HISTORIC PROPERTIES OF INTEREST IN THE APE

Designation No.	Resource Name	Location	Significance
HP-1	Churchville School	Bensenville	NRHP Listed
HP-2	Norwood Park Historical District (788 Contributing/53 Non-Contributing Buildings)	Chicago	NRHP Listed
HP-3	Noble-Seymour-Crippen House	Chicago	NRHP Listed
HP-4	Green Street School	Bensenville	NRHP Eligible
HP-5	Gas Service Station	Bensenville	NRHP Eligible
HP-6	Rest Haven Cemetery	Chicago	DOE pending/ Local Historic Resource
HP-7	St. Johannes/John's Cemetery	Chicago	Local Historic Resource
HP-8	United Terminal 1 and CTA Transfer Station, Helmut Jahn	On airport	DOE pending
HP-9	Old Control Tower, I.M. Pei	On airport	DOE pending
HP-10	Schwerdtfeger Farmstead	On airport	DOE pending
HP-11	Wingert House	Chicago	Commission on Chicago Landmarks
HPN-24	Old Edgebrook District	Chicago	Commission on Chicago Landmarks
HPN-4	Chicago & NW Depot	Chicago	NRHP Listed

Source: TPC Analysis

A number of "local sites" were also identified within the APE. Those sites identified as historic properties as defined by the NHPA (listed on or eligible to the NRHP) or identified by a Certified Local Government (CLG) were considered for direct or indirect impacts as a part of this section of the EIS. However, as required under the Section 4(f) of the Department of Transportation Act of 1966 "local sites" were assessed for potential direct and indirect impacts as a part of **Section 5.8, Department of Transportation Section 4(f) Lands and Land and Water Conservation Fund Section 6(f) Lands** and are presented in that section in addition to the Section 4(f)/6(f) Evaluation included in **Appendix L**.

5.9.2.1 On-Airport Direct and Indirect Impact Areas

An identification of potentially significant on-airport resources is in the process of being conducted for individual structures, as well as consideration of the airport as a district itself.

Schwerdtfeger Farmstead (City of Chicago)

A DOE for the Schwerdtfeger Farmstead was prepared and submitted to the IHPA for review on May 20, 2005. IHPA submitted a letter to the FAA on June 22, 2005, with questions regarding information contained in the FAA's DOE for the Schwerdtfeger Farmstead.³¹ FAA provided a response to the questions posed by IHPA on June 24, 2005.³² A response on the

³¹ Letter from IHPA to FAA, June 22, 2005.

³² Letter from FAA to IHPA, June 24, 2005.

IHPA's determination of eligibility is due in July 2005. However, irrespective of the determination on eligibility, for purposes of this EIS, the FAA is treating the Schwerdtfeger Farmstead as a locally important historic property.

The Schwerdtfeger Farmstead is a circa 1850 two-story brick residence and was built in two episodes. Charles Schwerdtfeger was born in the Province of Hanover in 1813 and immigrated to this country in 1833. The family originally moved to Indiana and then relocated to Addison Township around 1840. By 1877 his son owned 125 acres of prairie and 16 acres of timber. The original Schwerdtfeger Farmstead was purchased by the City of Chicago in 1950. This City leased the farmstead for residential use for several years, but it is now currently vacant.

On-Airport Structures

Different periods of O'Hare's history illustrate its prominence as a hub that reflects different transportation trends and changes in urban planning ideals. Numerous capital and infrastructure modifications were undertaken in response to these trends and ideals. These capital and infrastructure improvements are typical and yet illustrate that airport design is not static. Because airport design is not static, the airport no longer retains the ability to convey any particular trend or ideal as a whole. Therefore, no further investigations of the Airport as a whole are recommended.

Several buildings within the current Airport property, not to be directly impacted by any of the alternatives under consideration, were considered individually. An Architectural Investigation and DOE for On-Airport Properties was completed and submitted to the IHPA on May 20, 2005.³³ The IHPA responded to the FAA on June 23, 2005 and requested that three structures (the Rotunda, H & R Plant, and O'Hare Hilton) "be evaluated for National Register eligibility."³⁴ The FAA discussed the letter with the IHPA on June 24th, 2005. The IHPA stated that as there are no proposed impacts to the three structures under any of the Build Alternatives, there would be no need for evaluations of National Register eligibility. During that June 24th discussion, the IHPA requested that the FAA send a letter to IHPA with that information, and FAA sent a letter to that effect on June 27, 2005.³⁵

These buildings were identified and photographed as a part of the WGP Environmental Assessment. No further investigation was undertaken of these building since permission to review the architectural renderings could not be granted due to security considerations. These buildings are identified in **Table 5.9-2**. These facilities are not in the direct construction zone and will not be directly affected by any of the proposed Build Alternatives. Additionally, any indirect noise and visual impacts at these facilities for each of the proposed Build Alternatives would be approximately the same as is currently experienced or less.

³³ Architectural Investigation and Determinations of Eligibility for On-Airport Properties, May 20, 2005.

³⁴ Letter from IHPA to FAA, June 23, 2005.

³⁵ Letter from FAA to IHPA, June 27, 2005.

TABLE 5.9-2
POTENTIAL ON-AIRPORT HISTORICAL BUILDINGS

Potential On-Airport Historical Buildings	Architect
H & R Plant (1961)	C.F. Murphy Associates
Terminal 3 Concourses H and K (1961), Remodeled (1990)	C.F. Murphy Associates (1961) Belluschi and Welton Becket Associates (1990)
Rotunda Building (1962)	C.F. Murphy Associates
Old Control Tower (1970) (a)	I.M. Pei [prototype for I.M. Pei that would be imitated by other airports nationwide]
O'Hare Hilton (1972)	C.F. Murphy Associates
Elevated Parking Structure (1973)	Various Architects
United Airlines Terminal (1988) and Chicago Transit Authority (CTA) O'Hare Transfer Station (1984) (a)	Murphy/Jahn Associates
International Terminal 5 (1993)	Perkins & Will Architects
New Control Tower (1993)	Holmes & Narver
Schwerdtfeger Farmstead	Unknown
Sources: Preliminary Final Environmental Assessment for Scenic Hold Pad, Chicago O'Hare International Airport, City of Chicago Department of Aviation, April 1994; Final Environmental Assessment for Chicago/FAA Delay Task Force Recommendations: Hold Pads for Runways 9R and 27L; and Angled Exit Taxiway for Runway 4R at Chicago O'Hare International Airport, City of Chicago Department of Aviation, December 1992; Phase I Environmental Baseline Study O'Hare Air Reserve Forces Facility, Harza Environmental Services, January 1997; Final Environmental Assessment for Proposed United Airlines Headquarters Campus, Chicago O'Hare International Airport, City of Chicago Department of Aviation, April 28, 2000; Final Environmental Assessment for Proposed Touhy Avenue Detention Basin (Including Structure 140 and the Rechannelization of Willow-Higgins Creek), Chicago O'Hare International Airport, City of Chicago Department of Aviation, July 20, 2001; Final Environmental Assessment for Proposed O'Hare Express North Development, Chicago O'Hare International Airport, City of Chicago Department of Aviation, January 2002; Final Environmental Assessment for the World Gateway Program and Other Capital Improvements, City of Chicago Department of Aviation, June 2002.	
Notes: (a) Preliminary conversation with Cody Wright, IHPA, September 27, 2004 indicates that these structures may be potentially eligible to the NRHP. Each of these structures are considered under criterion exception G, as "exceptional" since technically they do not meet the age criterion for evaluation to the NRHP. None of the other structures meet the age criterion for listing on the NRHP.	

According to the WGP, many modern building at O'Hare follow design concepts originated by Chicago architect Ludwig Mies van der Rohe.³⁶ His architectural style exploits the use of concrete, steel, and specially fabricated glass as the principal exterior materials. The following section identifies the architect and describes the history of facilities located at O'Hare.

O'Hare International Airport- District (1943 through Present) – Various Architects

According to the WPG, many modern O'Hare building designs follow design concepts originated by Chicago architect Ludwig Mies van der Rohe.³⁷ His architectural style exploits the use of concrete, steel, and specially fabricated glass as the principal exterior materials. The historic context statement of O'Hare illustrates the number of changes undergone at the airport. O'Hare is significant as a district, in the innovative transportation design features that convey people to and from the airport both for departure and arrival. However, the integrity of the design features was modified over time, so the sense of time and place to convey the design

³⁶ Ludwig Mies van der Rohe (1886-1969).

³⁷ Ludwig Mies van der Rohe (1886-1969)

features is compromised. FAA recommends that there should not be further investigation of O'Hare Airport as a district.

Military Site Buildings (1943 through Present) – Various Architects

A number of existing buildings occupy the former military property located on the northeast portion of Airport property. This site was decommissioned in 1996 and is in the process of being acquired by the City of Chicago. The City of Chicago currently has a lease on the property. The deeds to the property will be transferred to the City of Chicago, once the U.S. Air Force completes remediation activities and all reporting requirements. During the lease acquisition, an Environmental Baseline Study was performed by Harza Engineering Company.³⁸ The buildings occupying the former military property were found not to be NRHP-eligible.³⁹ The IHPA concurred that there are no historic, architectural, or archaeological resources located on the entire 352-acre site.⁴⁰ Some former military buildings located in the property, including buildings along the alignment of the proposed Bessie Coleman Drive, are being removed by the City as an independent project to enhance safety and security.⁴¹

The IHPA requested a secondary independent review of the military site buildings, as the Harza Engineering Company report was completed in 1997. IHPA letters are generally valid only one to two years after issue. Specifically, IHPA was concerned that facilities designed by Albert Khan were present. Albert Khan was an innovative industrial designer who was an architect famous for innovative industrial facilities on military properties. No buildings were identified that appear to be affiliated with Albert Kahn. No architectural plans were made available for review. Other sources indicate that "The administration building was destroyed by fire on July 18, 1944, a fire that destroyed all engineering plans and purchasing records."⁴² The FAA has determined that it appears there are no buildings designed by Albert Khan on the former military property. FAA recommends that there should not be further investigation of military site buildings.

Heating & Refrigeration Plant (1961) – C.F. Murphy Associates

This facility is an example of Mies style design. It undergoes a transformation at night, when the dark glass curtain wall vanishes and the mechanical equipment inside appears as if on a giant TV screen. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

³⁸ Phase I Environmental Baseline Study O'Hare Air Reserve Forces Facility, Harza Environmental Services, January 1997.

³⁹ *Report of Investigations, Chicago O'Hare International Airport, O'Hare Modernization Program*. MARS, Inc. Archaeological Survey Work, Cultural Resources Management Report 1145a, December 13, 2002 (See **Appendix M – Archaeological, Cultural, and Historic Resources** of the EIS).

⁴⁰ Letter from Anne E. Haaker, Deputy State Historic Preservation Officer, Illinois Historic Preservation Agency, to Robert Suda, Harza Engineering Company, March 26, 1996.

⁴¹ Categorical Exclusion Determination for Demolition of Surplus Structures Associated with the Former O'Hare Air Reserves Forces Facility (ARFF), Federal Aviation Administration, March 12, 2002.

⁴² Mark Henkes, *DesPlaines: A History*, 1975.

Terminal 3 Concourses H and K (1961) – C.F. Murphy Associates; Remodeled (1990) Belluschi and Welton Becket Associates

American Airlines' Concourses H and K were started by one architectural firm and finished by another. This concourse was built with space in mind. The ceilings are constructed of glass and steel, which allow Terminal 3 to be illuminated by natural light. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

Rotunda Building (1962) – C.F. Murphy Associates

The rotunda was built with airport spectators in mind. It houses restaurants and bars and is column-free, with a pre-cast concrete slab roof suspended by steel cables from a central steel ring. The rotunda connects Terminals 2 and 3 and is also a gathering place for travelers. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

Old Control Tower (1968) – I.M. Pei

I.M. Pei was contracted by the FAA, in response to a 1962 Congressional mandate, to begin design of a standardized air traffic control tower. The directive of project was to "...design the most contemporary, state-of-the-art control tower which could be repeated across the country as a permanent symbol of air security".⁴³ I.M. Pei was charged with designing a five sided air traffic control tower prototype. This prototype was to be modified to a particular airports needs. He eventually developed a series of fifty control towers for the FAA. His fondness for simple, structural forms grew out of the series. The control towers were to become important in establishing I.M. Pei as a national presence.⁴⁴ The Old Control Tower was the prototype for I.M. Pei that would be imitated at other airports nationwide.⁴⁵ A prototype is defined by Webster's Dictionary as, "an original mode on which something is patterned, a first full-scale and usually functional form of a new type or design of a construction." The prototype by definition is significant as the first of its type.

I.M. Pei is considered to be an American icon. He is a fellow of the American Institute of Architects and a Corporate Member of the Royal Institute of British Architects. He was elected to the American Academy of Arts and Sciences, the National Academy of Design, and the American Academy and Institute of Arts and Letters. His awards and professional honors are prestigious and numerous.

I.M. Pei was born in Canton, China in 1917. He studied architecture at MIT and Harvard. Various encyclopedias of architecture stipulate that he is not concerned with theory; rather, his designs arise from original design concepts. His own website describes the challenge of designing the FAA Air Traffic Control Towers,

⁴³ Pei Cobb Freed & Partners, Projects, FAA Air Traffic Control Towers (50).

⁴⁴ Carter Wiseman, *I.M. Pei A Profile in American Architecture*, New York: Harry N. Abrams, Inc, 1990. Michael Cannell, *I.M. Pei Madarin of Modernism*, New York: Carol Southern Books, 1995.

⁴⁵ World Gateway Program Environmental Assessment, Federal Aviation Administration, June 2002.

The challenge of this project was to create a uniform image of flight safety in America. The directive was to design the most contemporary, state-of-the-art control tower which could be repeated across the country as a permanent symbol of air security. The FAA initiative was the first of many programs emanating from the Kennedy administration's emphasis on improved design in public buildings. The program specified three prototypical towers adaptable to all airfields, large and small, which could accommodate broad ranges of air traffic, operational services and physical configurations. Each installation included one component from each of three categories: 1) an aluminum control cab designed for unobstructed views and minimum specular refraction – a mass-produced instrumented package of prefabricated parts that could be assembled on the ground and hoisted into place, 2) a board-formed cast-in-place concrete shaft programmed as an independent freestanding tower and housing elevators, electronic cables, stairs, toilets, and 3) a cast-in-place concrete support facility at grade level and sometimes below, including administrative, mechanical, electrical and radar space. The site plan for each assemblage was adapted to its unique location.

The 200-foot high building O'Hare Control Tower is enclosed in glass at the top and houses a "radome."⁴⁶ The exterior retains excellent integrity. It appears that designers adapted the prototype for the O'Hare Tower to include a reinforced-concrete tower captured by a glass and metal cab. The design program divided the tower into three component parts, two types or sizes of control cab for visual flight control, and an underground base of varying sizes housing equipment for instrument flight control and other functions. A new tower replaced the old control tower. The old tower still stands today and is located adjacent to the O'Hare Hilton. The old tower is used by Airport Operations.

The Old Control tower is significant under Criteria C of the NRHP. First, it represents the work of a master. Specifically, the architect, I.M. Pei, has received awards and professional honors, some of which are describe above. It embodies distinctive characteristics of a type, period, or method of construction because it is the prototype of control towers in the United States. There is significant scholarly research available to provide an overview of the nature, role and impact of this building type within airport design worldwide to indicate that this building is of exceptional importance and meets the requirements for Criterion Consideration G.⁴⁷

O'Hare Hilton (1972) – C.F. Murphy Associates

The O'Hare Hilton stands 10 stories high and is 720-feet in curving length. The façade is black with glass windows and houses 858 rooms. The hotel is conveniently centered in the terminal core. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

⁴⁶ A radome is a descriptive term that defines a "dome" that contains "radar" equipment. Radar and communication antennae are located on top of the control tower.

⁴⁷ Criterion Consideration G - A property achieving significance within the last fifty years is eligible if it is of exceptional importance (NR Bulletin 15:42).

Elevated Parking Building (EPS) (1973) – Various Architects

The EPS was the world's largest parking building when completed. It was also the largest contract awarded by the City at the time. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

Delta Airlines Concourse L (1982) – Perkins & Will

The terminal was the first of the 1980s generation. Its greater width allows more spacious passage as well as more efficiency in passenger movement and baggage handling. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

Chicago Transit Authority (CTA) O'Hare Transfer Station (1984) – Murphy/Jahn Associates

Helmut Jahn was born in Nurmberg, Germany on January 4, 1940. He graduated from Technische Hochschule, Munich, Germany. His graduate studies were conducted at the Illinois Institute of Technology. Jahn gained prominence in Chicago through his work as an assistant to Gene Summers at C.F. Murphy. He became a principal in this firm in 1981.

Jahn is described as a "*wunderkinder*" (wonder child). His work is described as:

...an important contribution to the development of a strong technological expression in architecture. His buildings have consistently found his language in the use of contemporary material and its formal manipulation. Jahn's work is imbued with a firm belief in the inner renewal and continued growth of society, and with a faith in the implied power present in the newness of material.⁴⁸

The CTA O'Hare Transfer Station design was begun in 1979 with construction completed in 1983. The CTA O'Hare Transfer Station is described as "...the most architecturally noteworthy of any CTA station." The station is one part of a transfer system between two types of transportation, rail and air. The backlit glass-block walls undulate softly to deaden sound and please the eye. Enormous concrete beams form the ceiling of the station. These beams are post-tensioned concrete girders that transfer the load from above. The load from above is generated by the weight of the parking garage above. Its construction involved open cut excavation lined with sloping sprayed concrete beams. The beams run the entire length of the station. The beams are the starting point of a design that is "deliberately and enthusiastically decorative."⁴⁹ The decoration consists of a rainbow of color. Between the colored beams is a concealed light trough that reflects the color through to undulating glass block walls. Passengers traveling into or out of the station constantly are inundated with changing color. The station is reported to be the most noteworthy of any of the CTA stations designed by Helmut Jahn.

The subway station is the work of a master, Helmut Jahn, and is significant under Criterion C of the NRHP. This subway station is one of a kind in the world. The CTA Station won the 1987 AIA National Honor Award, the 1988 NEA Presidential Design Award, and was part of the

⁴⁸ George Renalli, Curator, *Helmut Jahn*, A Yale School of Architecture Exhibition, 1982.

⁴⁹ Nory Miller, *Helmut Jahn*, New York: Rizzoli, 1986.

1988 AIA Chicago Twenty-Five year award for O'Hare Airport. The CTA station is highlighted in architectural teaching books published in numerous languages. There is significant scholarly research available to provide an overview of the nature, role and impact of this building type within airport design worldwide to indicate that this building is of exceptional importance and meets the requirements for Criterion Consideration G.

United Airlines Terminal 1 (1985-1988) – Helmut Jahn of Murphy/Jahn

Helmut Jahn's transportation related architecture extends to the United Airlines Terminal 1. United's terminal is an expression of its time, place, and function. The terminal is stylistically defined as modern with Victorian references, and its construction system is exposed steel frame. Angles are set against curves and horizontal glazing against vertical.⁵⁰ The United Airlines terminal pedestrian tunnel was also completed at the same time as the new terminal. The 860-foot long tunnel connects Concourses B and C, and is submerged 35 feet below the apron where aircraft taxi and park. The tunnel features a four-lane long moving sidewalk, a canopy that spans 744 feet and moves through the world's largest kinetic light and sound sculpture.

The United Airline Terminal is described in the creator's words,

In a time when the direction of architecture is the subject of a great theoretical debate, its relationship to the past has emerged as a polemic issue. We see our work as an appropriate and innovative recomposition of classic and modern principles of the building arts. Rather than using form as quotations as orthodox duplications of a historic style, we seek conceptual relationships to response of a building to site and to context, entry and procession, spatiality, ornamentation, symbolic associations of historic forms. We synthesize these goals with intentions peculiar to a client, program, economics, efficiency and amenities of use and operation, and the possibilities of our age and its technology.

...The alternatives are: 'Late Modernism', which remains within the restricted language of modernism, but exaggerates through extreme logic, emphasis on circulation, and expression of technical systems, and complex use of geometry and cubist aesthetics leading to abstract forms; 'Post-Modernism', a loose term for many fragmented efforts, which constitutes a body of thought in architecture concerned with history, contextualism and symbolism...Though many of these approaches have led to new solutions, they often fail on the level of a total architecture. They represent 'one-liners' without any synthesis with other approaches, and each approach leads to an end in itself. Our work is based on the belief that the modern movement is not dead, and its principles can be extended and continued. We look to our immediate past-which has now become a tradition-and also to our remote past for inspiration.⁵¹

The United Terminal is significant under Criterion C, design and construction that embodies the distinctive characteristic of a type and period of construction, represent the work of a master and possess high artistic value. Specifically, the design and construction embodies the distinctive characteristic of an airport terminal complex that is pivotal in the evolution of "modern" airport terminal. The United Terminal has been widely recognized and fully studied

⁵⁰ Nory Miller, *Helmut Jahn*, New York: Rizzoli, 1986.

⁵¹ Joachim Andreas Joedicke. *Helmut Jahn: Design of a New Architecture*. New York: Nichols Publishing Company, 1986, pp.9-10.

as a textbook example of the recomposition of classic and modern styles having countless books and articles published in numerous languages. Jahn, in further recognition of the significance of his United Terminal design, received the following awards for the terminal: 1987 Structural Engineering Association of Illinois, 1987 AIA National Honor Award, R.S. Reynolds Memorial Award, 1988 Annual Design Review "Best of Category" Industrial Design Magazine, 1988 AIA Chicago Chapter Award, 1989 American Consulting, 1990 AIA Chicago Chapter Divine Detail Honor Award, 1990 Quaternano International Award for Innovative Technology in Architecture, 1990 AISC Award, and 1991 Ten Best Works of American Architecture Completed since 1975. There is significant scholarly research available to provide an overview of the nature, role and impact of this building type within airport design worldwide to indicate that this building is of exceptional importance and meets the requirements for Criterion Consideration G. Properties that have achieved significance within the last 50 years may be listed in the NRHP, only if they are of "exceptional importance."⁵²

International Terminal 5 (1993) – Perkins & Will Architects

The gentle arc of the long curvilinear roof recalls old hangars while evoking an "architecture of movement." The transparency, intended to enhance the traveler's orientation and conserve energy, makes the terminal dazzle at night. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

New Control Tower (1993) – Holmes & Narver

The 50,360 square-foot structural steel-framed building with architectural panels is 233 feet high, providing a center of operations for Airport Traffic Control. The base building is a five-level building consisting of a basement and four levels above ground. FAA has determined that this building does not appear to be significant and is not recommended as eligible to the NRHP.

Archaeological Resources

Recent archaeological surveys conducted from 1989 through 2001 have been performed for previous Airport development projects on various parts of the Airport property⁵³ and those field investigation activities have found no archaeological resources on Airport property. Midwest Archaeological Research Services, Inc. (MARS) [CCT] conducted an archaeological

⁵² National Register Bulletin 22. Guidelines for Evaluating and Nominating Properties that have Achieved Significance within the Last Fifty Years.

⁵³ Preliminary Final Environmental Assessment for Scenic Hold Pad, Chicago O'Hare International Airport, City of Chicago Department of Aviation, April 1994; Final Environmental Assessment for Chicago/FAA Delay Task Force Recommendations: Hold Pads for Runways 9R and 27L; and Angled Exit Taxiway for Runway 4R at Chicago O'Hare International Airport, City of Chicago Department of Aviation, December 1992; Phase I Environmental Baseline Study O'Hare Air Reserve Forces Facility, Harza Environmental Services, January 1997; Final Environmental Assessment for Proposed United Airlines Headquarters Campus, Chicago O'Hare International Airport, City of Chicago Department of Aviation, April 28, 2000; Final Environmental Assessment for Proposed Touhy Avenue Detention Basin (Including Structure 140 and the Rechannelization of Willow-Higgins Creek), Chicago O'Hare International Airport, City of Chicago Department of Aviation, July 20, 2001; Final Environmental Assessment for Proposed O'Hare Express North Development, Chicago O'Hare International Airport, City of Chicago Department of Aviation, January 2002; Final Environmental Assessment for the World Gateway Program and Other Capital Improvements, City of Chicago Department of Aviation, June 2002.

survey in 2002 on the remainder of the Airport property (See **Appendix M, Historic, Architectural, Archaeological, and Cultural Resources**).⁵⁴ The MARS survey identified five archaeological sites on the Airport:

- 11-Ck-95 – No name – Prehistoric site
- 11-Ck-970 – No name – Historic Euro-American site
- 11-Du-71 – No name – Prehistoric site
- 11-Du-74 – Nursery Site/Schwerdtfeger Farmstead – Historic Euro-American site
- 11-Du-471 – No name – Historic Euro-American site

Of these five sites, only one, the Schwerdtfeger Farmstead, 11DU74, may be eligible for inclusion on the National Register of Historic Places as an above-ground resource (standing structure). In keeping with archaeological sites being exempt under the Freedom of Information Act, a map of these sites is not produced.

5.9.2.2 Off-Airport Direct Impact Areas

The following historical resources were identified within the project off-airport land acquisition areas, but which are beyond the current Airport property. These resources are shown on **Exhibit 5.9-2**. A brief description of these historical resources is discussed in the following sections.

Cemeteries

St. Johannes Cemetery and Rest Haven Cemetery are located in the southwest corner of Airport property as depicted in **Exhibit 5.9-3**. Although these cemeteries are surrounded by Airport property, both are independently owned and are within the off-airport land acquisition areas.

Both cemeteries are church affiliated cemeteries that reflect early ethnic German heritage in Northeast Illinois and the region. The creation and continuity of the cemeteries reflect the broad spectrum of the community's German history and culture. The religious history of both cemeteries diverges from a need to fulfill a desire for communal expression of faith. The early German settlement worship years 1837-1847 are indelibly stamped not by a formal preacher or meeting place, rather by circuit riders who held some services in Dunklee's Grove in the southwest corner of Bensenville. This German ethnic history is reflected in cemeteries with the distinctive iconography and monuments or headstones inscribed in the German language. Each cemetery contains graves of the area's early settlers and includes veterans, at least from the Civil War, World War I and World War II.

At the request of the IHPA, formal DOEs for each cemetery were prepared and submitted to the IHPA for review. More details on the characteristics of each cemetery are included within these DOEs. Correspondence with the IHPA on these cemeteries is included in **Appendix M**.

⁵⁴ Report of Investigations Chicago O'Hare International Airport, O'Hare Modernization Program, Cultural Resource Management Report No. 1145a, Midwest Archaeological Research Services, December 13, 2002. (Refer to **Appendix M, Historic, Architectural, Archaeological, and Cultural Resources**.)

The City's announced intent to acquire these cemeteries has generated opposition from their owners, and from families and friends of those who have been interred there. In particular, the religious objector's of the acquisition of the cemeteries assert that the City's plan offends their religious beliefs concerning the resurrection of the dead and also would eliminate the use of the cemeteries for religious reflection. At present, a lawsuit is pending against the City and the FAA in which the cemetery owners and others are seeking to thwart the City's acquisition of these grounds. In this litigation, the plaintiffs assert that proceeding with the acquisitions would violate, among other things, federal constitutional and statutory measures protecting the exercise of their religious beliefs. For further information regarding these issues, see **Section 5.22, Other Issues Relating to Cemetery Acquisition.**

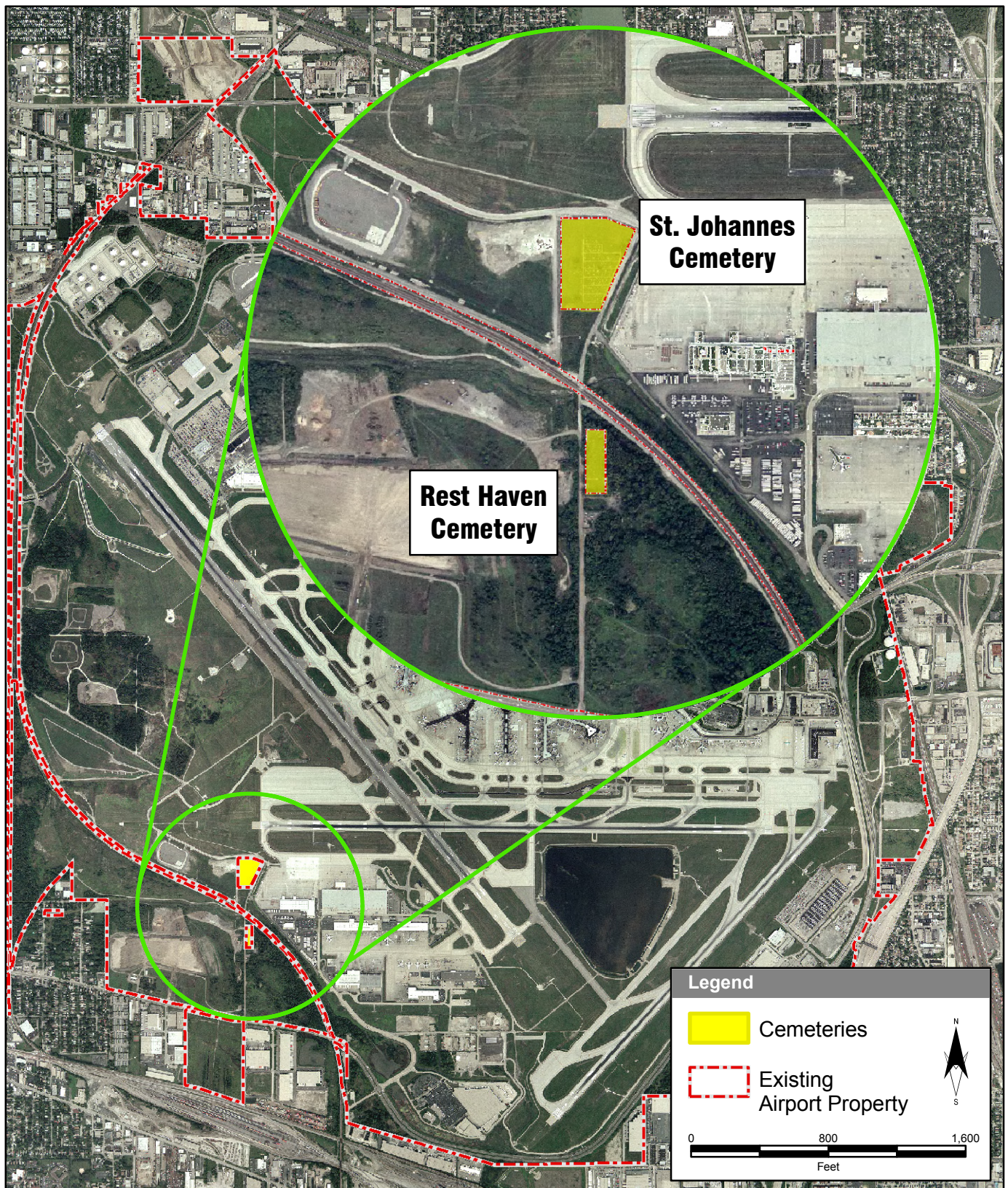
St. Johannes Cemetery

St. Johannes Cemetery occupies five acres in the southwest corner of the Airport. The cemetery is specifically located south of the approach end of existing Runway 9R within a secured area of the Airport; however, controlled access is provided to the public by way of Division Street, which is located off Irving Park Road, through a property managed by the City of Chicago Department of Streets and Sanitation, Bureau of Forestry. The history of St. Johannes is traced back to a traveling evangelical minister who arrived in 1837, Reverend Christian Friedrich Ludwig Cachand Ervendberg. St. Johannes cemetery was formally laid out in 1850, although research indicates that the first burial was in 1849. This cemetery is currently owned and maintained by the St. John United Church of Christ in Bensenville. A church structure was built in this area in the winter of 1849-50. The church building was moved, as the property was acquired to provide for the development of the original Orchard Field Airport in 1942. The cemetery remains intact, and burial services are still occasionally held at the cemetery.

Rest Haven Cemetery

Rest Haven Cemetery is a small cemetery located approximately one-quarter mile south of the St. Johannes Cemetery. It is also accessible to the public through the Bureau of Forestry site from Division Street. Rest Haven Cemetery is a religious cemetery in continuous use since at least 1864 for the burials of member of two churches, the United Methodist Church of Itasca and the United Methodist Church of Bensenville (First Evangelical Church) and their predecessor institutions.

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Source: Aerial: Aerial Express, September 2002. Cemeteries: City of Chicago Land Acquisition Parcel Database, January 2004.



Chicago O'Hare International Airport

O'Hare Modernization Environmental Impact Statement

Cemetery Locations

► Exhibit 5.9-3

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Northwest Parcel

No properties were identified within the Northwest Parcel that are currently listed on or eligible to the NRHP. **Appendix M, Historic, Architectural, Archaeological, and Cultural Resources**, includes further information on the Northwest Parcel, including the Phase I Investigations Report, and related correspondence with IHPA. Archaeological investigations of the NW parcel are not feasible at the time of this EIS as standing structures are located on the majority of the acquisition land. However, during the assessment of cultural resources, an evaluation model developed by the Illinois State Museum in conjunction with evaluation for deeply buried upland sites was utilized to determine the potential for prehistoric or historic archaeological subsurface features. The predictive model output suggests that there is minimal likelihood for undiscovered prehistoric archaeological resources within the Northwest Parcel. In addition, only four parcels were targeted for potential for historic archaeological subsurface features under extant buildings. For a full description of methodology and results of the Northwest Parcel predictive model, see **Appendix M**. This report was submitted to the IHPA on October 6, 2004. A comment letter on this report from IHPA was received on November 5, 2004.⁵⁵ IHPA commented that no archaeological properties are affected by the undertaking and therefore, IHPA has no objection to the undertaking proceeding as planned.

Southwest Parcel

Three standing buildings were originally identified within the Southwest Parcel as potential historic properties. These included the Green Street School, a Gas Service Station on Irving Park Road, and a Geodesic Dome, all located in Bensenville. After completion of the DOE for the Geodesic Dome, FAA recommended that this site was not eligible for listing on the NRHP. FAA recommended that both the Green Street School and the Gas Service Station are eligible for listing on the NRHP. IHPA concurred with these recommendations.

Green Street School

The FAA recommended the Green Street School as eligible for the NRHP. A formal DOE was submitted to the IHPA on April 25, 2005. IHPA concurred with FAA and has indicated that this property "may be eligible for listing on the National Register of Historic Places." A copy of the May 10, 2005 IHPA letter is included in **Appendix M**.

The Green Street School is significant at a local, regional and national level as it fosters the organization and accomplishment of American education, which is a broad pattern of history significant in our past. The school represents the educational history of the community of Bensenville and is an extraordinary example of early nineteenth century vernacular, academic architecture built during the early 1900's. The Green Street School embodies the distinctive characteristics of a type, period and method of construction. The Green Street School retains integrity to convey its significance through time and space. Today, the Green Street School property is being used as a multi-use commercial facility.

⁵⁵ IHPA letter to FAA, November 5, 2004.

Gas Service Station

This facility, which was recommended by FAA as eligible for listing on the NRHP, is a vacant roadside gas service station. This site is owned by the Village of Bensenville, who reportedly is considering demolishing the structure.⁵⁶ A formal DOE was submitted to the IHPA on April 22, 2005. IHPA concurred with FAA and has indicated that this property “may be eligible for listing on the National Register of Historic Places.” A copy of the May 10, 2005 IHPA letter is included in **Appendix M**.

As noted in the DOE analysis, Irving Park Road was an old plank road, which appears to be the early Western Plank Road. The Western Plank Road existed as early as 1851 and was one of the spokes that linked the early city of Chicago to the outlying portions of Cook County and other counties. Prior to the formal DOE, this Gas Service Station was identified as potentially eligible for the NRHP under the themes of commerce, trade, and transportation. It was noted to be a good example of a roadside resource built in the Gothic Revival Style. It appears to date between 1920 and 1940, when petroleum companies built facilities that were familiar, such as a house style.

Appendix M includes further information on the Southwest Parcel, including the Phase I Investigations Report, and related correspondence with IHPA. No historic districts were identified within the Southwest Parcel.

An archaeological investigation of the Southwest Parcel is not feasible at the time of this EIS as standing structures are located on the majority of the acquisition land. However, during the assessment of cultural resources, an evaluation model developed by the Illinois State Museum in conjunction with evaluation for deeply buried upland sites was utilized to determine the potential for prehistoric or historic archaeological subsurface features. Similar to the Northwest Parcel, the predictive model output suggests that there is minimal likelihood for undiscovered prehistoric archaeological resources within the Southwest Parcel as well. In addition, only one parcel was targeted for potential for historic archaeological subsurface features under standing buildings. For a full description of methodology and results of the Southwest Parcel predictive model, see **Appendix M**. This report was submitted to the IHPA on October 6, 2004.⁵⁷ The same comment letter received for the Northwest Parcel from IHPA on November 5, 2004 also referenced the Southwest Parcel.⁵⁸ IHPA commented that no archaeological properties are affected by the undertaking and therefore, IHPA has no objection to the undertaking proceeding as planned.

5.9.2.3 Off-Airport Indirect Impact Area

Of the 13 historic properties in the APE, six sites are located in the Off-Airport Indirect Impact Area. These include the Churchville School in Bensenville, the Norwood Park Historical

⁵⁶ Conversation between Karen Poulson (Archaeological Research Incorporated) and Steve Marshall Assistant Village Manager of Community Development, Village of Bensenville (June 20, 2004)

⁵⁷ DRAFT Prehistoric and Historic Archaeological Predictive Model of the Southwest Parcel of the O'Hare Modernization Environmental Impact Statement, Cook County, Illinois, October 6, 2004.

⁵⁸ IHPA letter to FAA, November 5, 2004.

District, and the Noble-Seymour-Crippen House, Wingert House, Chicago and Northwestern Depot, and Old Edgebrook District in Chicago. The following are descriptions of these historic properties.

- **HP-1: Churchville School:** According to the NRHP nomination form, the Churchville School is a locally significant building that meets listing in the NRHP under Criterion A for its association with education as a well-preserved example of a one-room schoolhouse in DuPage County, Illinois. Its period of significance is from circa 1846, when the schoolhouse is believed to have been built, to 1930 when the schoolhouse ceased to be used.
- **HP-2: Norwood Park Historical District:** The Commission on Chicago Landmarks states that the district meets Criteria A for community planning and development and Criteria C for architecture. The Norwood Park neighborhood was developed as a “railroad suburb” for professionals who worked in Chicago and commuted by train. Originally an independent village, the suburb was annexed to Chicago in 1893. Its street pattern is curvilinear rather than the Chicago rectangular grid. The district is predominantly comprised of single family houses that are representative of the architectural styles and buildings popular in Chicago and its suburbs during the mid-to-late 19th century and early-to-mid 20th century.
- **HP-3: Noble-Seymour-Crippen House:** This house was listed on the NRHP in 2004. The house is significant for exploration and settlement as well as social history. The house is currently used as the Norwood Park Historical Society Museum. The house typifies the history and development of the Norwood Park community, reflects the growth and change of Chicago over 150 years.
- **HP-11: Wingert House:** The Commission on Chicago Landmark describes this property as a modest building that is one of the few surviving early farmhouses located the Chicago city limits. It was built as the residence of John Wingert, one of a number of immigrants who, in seeking refuge from religious persecution in Germany, created a settlement called Canfield on the prairie frontier.
- **HP-4 Chicago and Northwestern Depot:** The NRHP nomination form indicates that the depot meets the eligibility requirement for listing under Criteria A and C. The depot is a community focal point of this northwestern neighborhood. The railroad was the single most important factor in the development of Chicago as a nationally and internationally significant city. For nearly one hundred years, the depot has stood as the Norwood Park community’s direct physical link to the heart of the city and hence to the rest of the nation. It is locally significant under Criterion A with a period of significance from 1907 through 1950. The Chicago architectural firm of Frost & Granger designed the depot in the Arts & Craft style popularized around the turn of the century.

HP-24: Old Edgebrook District: The Commission on Chicago Landmarks describes the Old Edgebrook District as a distinct example of a railroad suburb that was platted in 1894 by Arthur Dixon, a businessman and alderman. The community was built near the Chicago, Milwaukee and St. Paul Railroad. Many of the community's early residents were company officials and the buildings represent a variety of architectural styles.

5.9.3 Alternatives Analysis

The potential effects of the project alternatives on historical, architectural, archaeological or cultural resources are described within this section. Specifically, this section describes the impacts of each alternative in a comparative form to highlight the environmental differences of the alternatives. The direct impacts are presented for Construction Phase II since this is the phase when the proposed land acquisition is anticipated to be completed.

Within the Draft EIS, interim noise levels (by Construction Phase) were presented for disclosure purposes. The FAA has determined that the short-term/temporary aircraft noise levels experienced before completion of any of the Build Alternatives (C, D, and G), if selected, would not result in any changes in the current uses of the historic resources in the vicinity of O'Hare. As a result, this section of the Final EIS presents the Build Out + 5 noise impacts.

5.9.3.1 Construction Phase II

Alternative A – No Action

Alternative A would have no direct effect on historic properties.

Alternative C

Alternative C would directly impact four historic properties in the APE including the Gas Service Station, St. Johannes and Rest Haven Cemeteries, and the Schwertfeger Farmstead on Airport property. These properties would be directly impacted as a result of construction activities that would require demolition and/or relocation of these resources.

Green Street School was originally proposed for acquisition and demolition under Build Alternative C only. Subsequent to the preparation of the Draft EIS, as a part of the Draft Section 4(f) Evaluation and during the development of this Final EIS, FAA identified that a minor modification to the Green Street School chimney may obviate the need to acquire the property. FAA technical experts identified that a chimney on this structure would penetrate the Terminal Instrument Procedures (TERPS) Surfaces of proposed Runway 10R/28L. If Build Alternative C were selected, the City of Chicago may need to obtain an aviation easement to lower the height of the chimney by 9.1 feet, which would avoid acquisition of the property. The FAA has determined that the lowering of this chimney could be done in accordance with Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995). The City may also acquire this property and maintain use of the structure to avoid impacts on this historic property. A copy of FAA's May 13, 2005 letter to the City of Chicago concerning the Green Street School is included in the Section 4(f) Evaluation in **Appendix L**. FAA submitted a letter to the IHPA on June 2, 2005 requesting concurrence on

FAA's determination that the proposed chimney lowering would not constitute an adverse impact to the historic nature of the structure.⁵⁹

Alternatives D and G

Alternatives D and G would also directly impact four historic properties in the APE including the Gas Service Station, the St. Johannes and Rest Haven Cemeteries, and the Schwerdtfeger Farmstead on Airport property. These properties would be directly impacted as a result of construction activities that would require demolition and/or relocation of these resources. The Green Street School would not be demolished as a part of Alternatives D and G.

5.9.3.2 Build-Out + 5

Alternative A – No Action

Alternative A would have no direct effect related on historic properties related to land acquisition. Noise levels related to the No Action Alternative (Alternative A) at the various historic resources are presented in **Table 5.9-3**.

Alternative C

As previously discussed, all of the historic properties proposed for acquisition under Alternative C (Green Street School, Gas Service Station, St. Johannes Cemetery, Rest Haven Cemetery, and the Schwerdtfeger Farmstead) would be acquired prior to Construction Phase II. Green Street School may be acquired but would not be demolished. As a result, there would be no noise impacts to these resources.

Noise levels for the remaining historic resources proposed to remain under Alternative C are presented in **Table 5.9-3**. Under Alternative C, two on-Airport historic properties are brought into the 65 DNL or greater contour in the Build Out + 5 phase. These include the Old Control Tower and the United Terminal 1/CTA Transfer Station, both of which are located on Airport property, in the Terminal Core area. As previously discussed, these properties would remain in place under Alternative C and the land uses are compatible with the projected noise levels under this scenario.

Alternative D

As previously discussed, all of the historic properties proposed for acquisition under Alternative D (Gas Service Station, St. Johannes Cemetery, Rest Haven Cemetery, and the Schwerdtfeger Farmstead) would be acquired prior to Construction Phase II. As a result, there would be no noise impacts to these resources.

Noise levels for the remaining historic resources proposed to remain under Alternative D are presented in **Table 5.9-3**. Similar to Alternative C, two on-Airport historic properties are brought into the 65 DNL or greater contour area as a result of Alternative D in the Build Out + 5 phase. These include the Old Control Tower and the United Terminal 1/CTA Transfer Station,

⁵⁹ Letter from FAA to IHPA, June 2, 2005.

both of which are located on Airport property, in the Terminal Core area. As previously discussed, these properties would remain in place under Alternative D and the land uses are compatible with the projected noise levels under this scenario.

Alternative G


Similar to Alternative D, the four historic properties, the Gas Service Station in Bensenville, the two cemeteries, and the Schwerdtfeger Farmstead located on-Airport, would all be removed or relocated under Alternative G prior to Construction Phase II. As a result, there would be no noise impacts to these resources.

Noise levels for the remaining historic resources proposed to remain under Alternative G are presented in **Table 5.9-3**. Similar to Alternatives C and D, two on-Airport historic properties are brought into the 65 DNL or greater contour area as a result of Alternative G in the Build Out phase. These include the Old Control Tower and the United Terminal 1/CTA Transfer Station, both of which are located on Airport property, in the Terminal Core area. As previously discussed, these properties would remain in place under Alternative G and the land uses are compatible with the projected noise levels under this scenario.

TABLE 5.9-3
POTENTIAL DIRECT AND INDIRECT EFFECTS ON HISTORIC PROPERTIES
BUILD OUT + 5

Map ID	Description	Land Use Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
Historic Properties							
HP-1	Churchville School	65	53.8	54.3	57.2	54.7	54.8
HP-2	Norwood Park Historical District	65	55.9	58.2	64.0	64.1	64.2
HP-3	Noble-Seymour-Crippen House	65	57.8	60.0	64.6	64.6	64.7
HP-4	Green Street School (Commercial Property)	70	58.5	61.3	65.6	62.8	62.9
HP-5	Gas Service Station (vacant)	NA	58.4	60.2			
HP-6(a)	Rest Haven Cemetery	85	65.6	68.5			
HP-7(a)	St. Johannes Cemetery	85	73.5	74.8			
HP-8(a)	United Terminal 1 and CTA Transfer Station	NA	65.3	64.9	66.1	66.5	66.1
HP-9(a)	Old Control Tower	NA	65.3	64.8	65.9	66.2	65.8
HP-10(a)	Schwerdtfeger Farmstead (vacant)	NA	62.7	65.7			
HP-11	Wingert House	65	55.1	54.6	59.5	60.0	59.5
HPN-24	Old Edgebrook District	65	53.5	55.2	60.7	60.7	60.8
HPN-4	Chicago & NW Depot	75	54.6	56.0	61.2	61.4	61.4

Legend:

 Potential Direct Impact. Property may be acquired and/or demolished.

Notes:

(a) Determinations of Eligibility pending
 NA= Not Applicable or Available

Source: TPC Analysis

5.9.4 Summary

Table 5.9-4 summarizes the direct impacts on historic properties for each of the proposed alternatives. There are a total of four historic properties under Alternatives C, D and G that would be acquired and removed or relocated. Green Street School, if acquired, would not be demolished.

No indirect impacts related to noise are anticipated at any of the historic properties.

TABLE 5.9-4
SUMMARY OF HISTORIC PROPERTY DIRECT IMPACTS

Designation No.	Resource Name	Acquisition/Removal of Historic Properties			
		Alternative A	Alternative C	Alternative D	Alternative G
HP-1	Churchville School	None	None	None	None
HP-2	Norwood Park Historical District	None	None	None	None
HP-3	Noble-Seymour-Crippen House	None	None	None	None
HP-4	Green Street School	None	Potential Acquisition/ but no demolition	None	None
HP-5	Gas Service Station	None	Yes	Yes	Yes
HP-6	Rest Haven Cemetery	None	Yes	Yes	Yes
HP-7	St. Johannes/John's Cemetery	None	Yes	Yes	Yes
HP-8	United Terminal 1 and CTA Transfer Station, Helmut Jahn	None	None	None	None
HP-9	Old Control Tower, I.M. Pei	None	None	None	None
HP-10	Schwertdfeger Farmstead	None	Yes	Yes	Yes
HP-11	Wingert House	None	None	None	None
HPN-24	Old Edgebrook District	None	None	None	None
HPN-4	Chicago & NW Depot	None	None	None	None
Total Historic Properties to be Acquired/Removed		0	4	4	4
Source: TPC Analysis					

5.9.5 Potential Mitigation Measures

The following section outlines the potential mitigation measures for impacts to each of the historic resources.

5.9.5.1 St. Johannes Cemetery

Even though there is no final determination of eligibility at this time from the Keeper of the NRHP, for purposes of this EIS, FAA is treating St. Johannes Cemetery as a locally important historic property. As a result, the FAA has developed specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f). As a result of impacts to this Cemetery, a Draft Memorandum of Agreement (MOA), or an Agreement (if the cemetery is not determined to be eligible), is being developed which outlines the steps that would be taken in mitigating the adverse impacts. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

- Map of the Cemetery - Within 180 days of the FAA's issuance of a Record of Decision, if a Build Alternative is approved, and the City of Chicago's decision to proceed with the proposed O'Hare Modernization, the City of Chicago would produce a professional level survey of all identified graves, and all historic features visible on the ground surface within St. Johannes Cemetery.

- Photographic Recordation - The headstones and all other above ground features will be recorded with archival photography prior to their removal. The City of Chicago would prepare six to nine, 5" x 7", 35 mm, archivally-processed, black-and-white photographs of each headstone.
- A copy of documentation related to the MOA will be provided to the National Park Service, the, the St. John's United Church of Christ, Village of Bensenville, and the Bensenville Historical Commission.

5.9.5.2 Rest Haven Cemetery

Even though there is no determination of eligibility at this time from the IHPA, for purposes of this EIS, FAA is treating Rest Haven Cemetery as a locally important historic property. As a result, the FAA has developed specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f). As a result of impacts to this Cemetery, a Draft Memorandum of Agreement (MOA), or an Agreement (if the cemetery is not determined to be eligible), is being developed which outlines the steps that would be taken in mitigating the adverse impacts. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

- Map of the Cemetery - Within 180 days of the FAA's issuance of a Record of Decision, if a Build Alternative is approved, and the City of Chicago's decision to proceed with the proposed O'Hare Modernization, the City of Chicago would produce a professional level survey of all identified graves, and all historic features visible on the ground surface within Rest Haven Cemetery.
- Photographic Recordation - The headstones and all other above ground features will be recorded with archival photography prior to their removal. The City of Chicago would prepare six to nine, 5" x 7", 35 mm, archivally-processed, black-and-white photographs of each headstone.
- A copy of documentation related to the MOA will be provided to the National Park Service, the Rest Haven Cemetery Association, Village of Bensenville, and the Bensenville Historical Commission.

5.9.5.3 Gas Service Station (Village of Bensenville)

To address the project-related impacts (acquisition) at this historic site, an MOA is being developed that outlines the proposed mitigation measures. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

- Within 180 days of the FAA's issuance of a Record of Decision, the City of Chicago (with oversight by FAA) will produce a Historic American Building Survey (HABS) document of the Schwerdtfeger Farmstead. This document will include:

- **Measured Drawings:** The HABS document will include a set of measured drawings. The set of measured drawings will include plans, elevations, sections, details and a cover sheet with a site plan and written information.
- **Large-Format Photographs:** The HABS document will include a set of large-format black and white photographs that are perspective corrected. Photographs will include overall views, elevations and details of important exterior and interior features of the buildings.
- **Written History:** The HABS document will include an in depth critically developed historic context of the building. **Archival Documentation:** The HABS document will be produced in accordance with all archival requirements as outlined by the National Park Service.
- Copies of the HABS document will be distributed to the NPS, the IHPA, the Village of Bensenville, and the Bensenville Historical Commission.

5.9.5.4 Schwerdtfeger Farmstead (City of Chicago)

Even though there is no determination of eligibility at this time from the IHPA, for purposes of this EIS, FAA is treating Schwerdtfeger Farmstead as a locally important historic property. As a result, the FAA has developed specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f). As a result of impacts to this property, a Draft Memorandum of Agreement (MOA), or an Agreement (if the cemetery is not determined to be eligible), is being developed which outlines the steps that would be taken in mitigating the adverse impacts. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

- Within 180 days of the FAA's issuance of a Record of Decision, the City of Chicago (with oversight by FAA) will produce a Historic American Building Survey (HABS) document of the Schwerdtfeger Farmstead. This document will include:
 - **Measured Drawings:** The HABS document will include a set of measured drawings. The set of measured drawings will include plans, elevations, sections, details and a cover sheet with a site plan and written information.
 - **Large-Format Photographs:** The HABS document will include a set of large-format black and white photographs that are perspective corrected. Photographs will include overall views, elevations and details of important exterior and interior features of the buildings.
 - **Written History:** The HABS document will include an in depth critically developed historic context of the building. **Archival Documentation:** The HABS document will be produced in accordance with all archival requirements as outlined by the National Park Service.

- Copies of the HABS document will be distributed to the NPS, the City of Chicago, the Chicago Landmarks Commission, the Chicago Historical Society, and the IHPA.

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